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13 *Toshiba America, Inc.,*

14 *Toshiba America Consumer Products, LLC,*

15 *Toshiba America Information Systems, Inc.,*

16 *and Toshiba America Electronic Components, Inc.*

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 (SAN FRANCISCO DIVISION)

20 IN RE: CATHODE RAY TUBE (CRT)
21 ANTITRUST LITIGATION

22 Case No. 07-5944 SC
23 MDL No. 1917

24 This Document Relates To:

25 *The Indirect Purchaser Action*

26 *Electrograph Systems, Inc. et al. v. Hitachi, Ltd.*
27 *et al.*, No. 11-cv-01656;

28 *Siegel v. Hitachi, Ltd., et al.*,
No. 11-cv-05502;

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
No. 11-cv-05513;

Target Corp., et al. v. Chunghwa Picture Tubes,
Ltd., et al., No. 11-cv-05514;

**DECLARATION OF
LUCIUS B. LAU IN SUPPORT OF
DEFENDANTS' REPLY
MEMORANDUM IN SUPPORT OF
MOTION TO EXCLUDE
CERTAIN EXPERT TESTIMONY
OF PROFESSOR KENNETH
ELZINGA**

DECLARATION OF LUCIUS B. LAU IN SUPPORT OF DEFENDANTS' REPLY MEMORANDUM TO
EXCLUDE CERTAIN EXPERT TESTIMONY OF PROF. ELZINGA

Case No. 07-5944-SC
MDL No. 1917

1 *Sears, Roebuck and Co., et al. v. Chunghwa*
2 *Picture Tubes, Ltd., et al.*, No. 11-cv-05514;

3 *Interbond Corporation of America v. Hitachi, et*
4 *al.*, No. 11-cv-06275;

5 *Office Depot, Inc. v. Hitachi, Ltd., et al.*,
6 No.11-cv-06276;

7 *CompuCom Systems, Inc. v. Hitachi, Ltd. et al.*,
8 No. 11-cv-06396;

9 *Costco Wholesale Corporation v. Hitachi, Ltd.,*
10 *et al.*, No. 11-cv-06397;

11 *P.C. Richard & Son Long Island Corporation, et*
12 *al. v. Hitachi, Ltd., et al.*, No. 12-cv-02648;

13 *Schultze Agency Services, LLC v. Hitachi, Ltd.,*
14 *et al.*, No. 12-cv-02649;

15 *Tech Data Corporation, et al. v. Hitachi, Ltd.,*
16 *et al.*, No. 13-cv-00157;

17 *Sharp Electronics Corp., et al. v. Hitachi, Ltd.,*
18 *et al.*, No. 13-cv-01173;

19 *ViewSonic Corporation, v. Chunghwa Picture*
20 *Tubes, Ltd., et al.*, No. 3:14cv-02510

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DECLARATION OF LUCIUS B. LAU IN SUPPORT OF DEFENDANTS' REPLY MEMORANDUM TO
EXCLUDE CERTAIN EXPERT TESTIMONY OF PROF. ELZINGA

Case No. 07-5944 SC
MDL No. 1917

1 I, Lucius B. Lau, hereby declare as follows:

2 1. I am an attorney with the law firm of White & Case LLP, counsel for
3 Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Consumer
4 Products, LLC, Toshiba America Information Systems, Inc., and Toshiba America Electronic
5 Components, Inc. (collectively, the "Toshiba Defendants").


6 2. I submit this declaration in support of Defendants' Reply Memorandum In
7 Support of Motion to Exclude Certain Expert Testimony of Professor Kenneth Elzinga.
8 Except for those matters stated on information and belief, which I believe to be true, I have
9 personal knowledge of the facts stated herein, and I could and would competently testify
10 thereto if called as a witness.

11 3. Attached hereto as Exhibit A is a true and correct copy of excerpts from the
12 deposition of Kenneth Elzinga, taken July 7, 2014.

13 I declare under penalty of perjury that the foregoing is true and correct.

14 Executed this 9th day of February, 2015, in Washington, D.C.

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Lucius B. Lau

DECLARATION OF LUCIUS B. LAU IN SUPPORT OF DEFENDANTS' REPLY MEMORANDUM TO
EXCLUDE CERTAIN EXPERT TESTIMONY OF PROF. ELZINGA

Case No. 07-5944-SC
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Exhibit A
Filed Under Seal